

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS

W.M.M., *et al.*, on their own behalf and on behalf of
all others similarly situated,

Petitioners–Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Respondents–Defendants.

Case No. 1:25-cv-00059

DECLARATION OF CHRISTOPHER CLAY

I, Christopher Clay, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct, to the best of my knowledge and belief:

- 1) I am a Senior Manager at the American Civil Liberties Union of Texas. I make this Declaration based upon personal knowledge, except where indicated.
- 2) I am over 18 years old, and
- 3) Pursuant to the Federal Rule of Civil Procedure, Rule 4 (i)(1), on June 21st, 2025, on behalf of Plaintiff-Petitioners, I served via certified FedEx mail a copy of the summons, complaint, emergency application for temporary restraining order, memoranda in support of temporary restraining order, motion for class certification, memoranda in support of class certification, motion to proceed under pseudonyms, memorandum of law in support of motion to proceed under pseudonyms, motion for leave to appear without local counsel and memorandum of law in support of motion for leave to appear without local counsel in Case No. 1:25-cv-00059 to the civil-process clerk at the United States attorney's office for the Northern District of Texas

and to the Attorney General of the United States in Washington, D.C. FedEx records indicate that service was delivered on June 25th, 2025 and June 26th, 2025, respectively.

- 4) In addition to serving the United States as described above, pursuant to the Federal Rules of Civil Procedure, Rule 4 (i)(2), on June 25th, 2025, on behalf of Plaintiff-Petitioners, I served via certified FedEx mail a copy of the summons, complaint, emergency application for temporary restraining order, memoranda in support of temporary restraining order, motion for class certification, memoranda in support of class certification, motion to proceed under pseudonyms, memorandum of law in support of motion to proceed under pseudonyms, motion for leave to appear without local counsel and memorandum of law in support of motion for leave to appear without local counsel in the above-captioned case to the following defendants in their official capacity at their corresponding government agency or government facility addresses:
- a. Donald J. Trump, in his official capacity as President of the United States;
 - b. Pamela Bondi, in her official capacity as Attorney General of the United States;
 - c. Marco Rubio, in his official capacity as the United States Secretary of State;
 - d. U.S. State Department
 - e. Kristin Noem, in her official capacity as the United States Secretary of Homeland Security;
 - f. U.S. Department of Homeland Security;
 - g. Todd Lyons, in his official capacity as Acting Director of U.S. Immigration and Customs Enforcement;
 - h. U.S. Immigration and Customs Enforcement;

- i. Josh Johnson, in his official capacity as acting Dallas Field Office Director for U.S. Immigration and Customs Enforcement;
 - j. Marcello Villegas, in his official capacity as the Facility Administrator of the Bluebonnet Detention Center;
 - k. Phillip Valdez, in his official capacity as Facility Administrator of the Eden Detention Center;
 - l. Jimmy Johnson, in his official capacity as Facility Administrator of the Prairieland Detention Center;
 - m. Judith Bennett, in her official capacity as Warden of the Rolling Plains Detention Center;
- 5) FedEx records indicate that service was delivered to the above-named defendants on the following:
- a. June 26, 2025, Donald J. Trump, in his official capacity as President of the United States;
 - b. June 26, 2025, Pamela Bondi, in her official capacity as Attorney General of the United States;
 - c. June 25, 2025, Marco Rubio, in his official capacity as the United States Secretary of State;
 - d. June 25, 2025, U.S. State Department
 - e. June 25, 2025, Kristin Noem, in her official capacity as the United States Secretary of Homeland Security;
 - f. June 25, 2025, U.S. Department of Homeland Security;
 - g. June 25, 2025, Todd Lyons, in his official capacity as Acting Director of U.S. Immigration and Customs Enforcement;
 - h. June 25, 2025, U.S. Immigration and Customs Enforcement;
 - i. June 25, 2025, Josh Johnson, in his official capacity as acting Dallas Field Office Director for U.S. Immigration and Customs Enforcement;

- j. June 25, 2025, Marcello Villegas, in his official capacity as the Facility Administrator of the Bluebonnet Detention Center;
- k. June 25, 2025, Phillip Valdez, in his official capacity as Facility Administrator of the Eden Detention Center;
- l. June 25, 2025, Jimmy Johnson, in his official capacity as Facility Administrator of the Prairieland Detention Center;
- m. June 26, 2025, Judith Bennett, in her official capacity as Warden of the Rolling Plains Detention Center;

Executed on the 3rd of July 2025.

/s/ Christopher Clay
Christopher Clay
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